April 7, 2025

Dear Chairman Carr,

On behalf of WYTV, I'm writing you as part of the *In re: Delete, Delete, Delete* proceeding to urge the Federal Communications Commission (FCC) to eliminate the current rules that: (1) place a cap on the percentage of the country's television households that a broadcast company may reach; and (2) limit the number of stations a broadcast company may own in any single local market. As the media landscape continues to evolve, these outdated regulations are hindering the ability of local broadcasters to compete against "Big Tech" in what has become an increasingly digital and highly competitive marketplace dominated by a few giant platforms that have no meaningful connection to our local community.

Here at WYTV, we are deeply involved in the local communities we serve in Eastern Ohio and Western Pennsylvania. Every week, we produce over 19 hours of local news and information through our various local newscasts. Our newsroom strives to provide relevant local and regional stories that impact our communities every day of the year.

Taking an active role in the community is something we do year round. We air local specials that celebrate Black History Month in February, Women's History Month in March and Hispanic Heritage Month in September and October. Every year we produce and air over 50 Game of the Week contests showcasing local high school football games, as well as boys and girls basketball contests. Each summer, we shift gears and televise the regional boys and girls Little Leage championships, showcasing our areas 9,10, 11 and 12 year old all stars. Our Student Athlete of the Week has been showcasing local high school athletes that also excel in the classroom in our newscasts for almost 40 years. Each spring we also salute high school valedictorians with our Academic Excellence campaign. And we culminate the year by sponsoring the annual holiday parade in downtown Youngstown and by partnering with the U.S. Marines Toys for Tots project., which ensures thousands of children will wake up on Christmas morning knowing that Santa and their hometowns love and care about them.

It's also part of the bigger commitment of our entire industry. Television viewers in communities across the United States depend on their local TV stations to provide them with important information that directly impacts their lives, including news, weather, sports, and often lifesaving emergency information. Local TV stations are often the first place people turn to for news and information and, increasingly, the only remaining source of local journalism. As local newspapers, like the Youngstown Vindicator, go out of business, the role local broadcasters play in disseminating accurate information is more important than ever. Still, local stations like this one are suffering because of archaic FCC rules and regulations that have no connection to current marketplace realities. In short, without regulatory relief, local television stations will be unable to continue making the kinds of investments necessary to produce the high-quality news and information programing upon which our viewers rely daily.

The current ownership restrictions originally were intended to promote competition and diversity in broadcasting and were conceived at a time when streaming technology didn't even exist and the few large platforms were the legacy Big 3 broadcast networks. However, those days are long gone. With streaming platforms, digital content providers, and Big Tech now dominating the advertising and media distribution sectors, local broadcasters like WYTV are at a distinct disadvantage. The obvious constraints of the broadcast cap are stark when contrasted against the unlimited reach of Big Tech into multiple devices in every household in America. In order to remain viable and continue providing high-quality local news, emergency information, and community programming, local broadcasters need the flexibility to grow without restriction, just like their Big Tech counterparts.

Eliminating or modernizing these regulations would:
• Enable local broadcasters to expand and enhance their local news and community programming and continue investing in new technology, innovation, and viewer services.
• Allow local broadcasters to better compete with digital giants that are not subject to the current restrictions on reach.
• Improve efficiency in operations, ensuring financial stability and more effective long-term planning.

The reality of today's media environment demands a reconsideration of legacy rules that no longer reflect the urgent situation hastened by the industry's competitive dynamics. We urge the FCC to take swift, decisive action in eliminating the restrictions on media ownership to ensure a level playing field that benefits both local broadcasters and the communities we serve.

Thank you for your attention to this important matter.

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Sincerely,

David Coy
Vice President & General Manager
WYTV Youngstown, Ohio.